

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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In Re:	:	
	:	
LISA MARIE NOVOSAT	:	:CHAPTER 13
	:	:CASE NO. 22-22250-CMB
Debtor.	:	
	:	:Hearing Date: May 2, 2024 @ 11:00 a.m.
	:	
Truman 2021 SC9 Title Trust,	:	
	:	
Movant/Secured Creditor,	:	
v.	:	
	:	
Michael and Kerri Schoemaker,	:	
	:	
Debtors,	:	
And	:	
	:	
Ronda J. Winnecour	:	
	:	
Chapter 13 Trustee,	:	
	:	
Respondents.	:	

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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Truman 2021 SC9 Title Trust ("Movant"), has filed a motion for adequate protection under 11 U.S.C. § 362(d) with the court to permit Movant to pursue its rights in the property described below to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law.

**48 Marion Drive, Zelienople, Pennsylvania 16063.**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

1) If you do not want the Court to grant Movant relief from the automatic stay regarding the above property, or if you want the court to consider your views on the motion, then on or before April 25, 2024, you or your attorney must do all of the following:

a) File with the Court a written response to Movant's motion explaining your position. Your response must be filed with the Bankruptcy Clerk, at the United States Bankruptcy Court, Western District of Pennsylvania, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above:

b) You must also mail a copy to:

Emmanuel J. Argentieri, Esquire  
ROMANO GARUBO & ARGENTIERI  
52 Newton Avenue, P.O. Box 456  
Woodbury, New Jersey 08096  
Attorney for Movant

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
Chapter 13 Trustee

2) If you or your attorney do not take the steps described in Paragraph 1(a) and Paragraph 1(b) and attend the hearing, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested in the motion.

3) A hearing on the motion is scheduled to be held before the Honorable Carlota M. Bohm, on May 2, 2024 at 11:00 a.m., United States Bankruptcy Court, Western District of Pennsylvania, 600 Grant Street, Courtroom A on the 54<sup>th</sup> Floor of the U.S. Steel Tower, Pittsburgh, Pennsylvania.

4) If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in ¶1(b).

5) You may contact the Judge's Courtroom Deputy at (412)644-4328 to find out whether the hearing has been canceled because no one filed an answer.

ROMANO GARUBO & ARGENTIERI  
Attorneys for Movant

By: /s/ Emmanuel J. Argentieri  
Emmanuel J. Argentieri, Esquire  
PA Attorney ID No. 59264

Dated: April 8, 2024

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